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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 In re:

14 PG&E CORPORATION; PACIFIC GAS  
15 AND ELECTRIC COMPANY,

16  
17 Reorganized Debtors,

- 18  
19 ☐ Affects PG&E Corporation  
20 ☐ Affects Pacific Gas and Electric Company  
21 ☒ Affects both Debtors

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

United States Bankruptcy Court  
Courtroom 17  
16<sup>th</sup> Floor  
San Francisco, CA 94102

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25 **JOINDER OF LEHIGH COUNTY EMPLOYEE PENSION BOARD TO THE LEAD**  
26 **PLAINTIFF PERA AND THE SECURITIES ACT PLAINTIFFS' RESPONSE AND**  
27 **OPPOSITION TO THE REORGANIZED DEBTORS' THIRTY-THIRD SECURITIES**  
28 **OMNIBUS CLAIMS OBJECTION**

1 Lehigh County Employee Pension Board (“Lehigh County EPB”) hereby submits this  
2 joinder (the “Joinder”) to the *Lead Plaintiff PERA and The Securities Act Plaintiffs’ Response*  
3 *and Opposition to Reorganized Debtors’ Thirty-third Securities Omnibus Claims Objection*  
4 (“PERA’s Opposition to the Thirty-Third Objection”) [ECF no. 14342]. In support hereof,  
5 Lehigh County EPB respectfully states as follows:  
6

7 **BACKGROUND**

8 1. Lehigh County EPB is a Securities Claimant who timely filed proofs of claims  
9 against the Debtors in accordance with the Extended Bar Date Order. Specifically, on April 15,  
10 2020, Lehigh County EPB filed claims 100243 and 100268 against PG&E Corporation  
11 (“PG&E”) and Pacific Gas and Electric Company (“Pacific Gas and Electric,” and together with  
12 PG&E, the “Debtors”).<sup>1</sup> In addition, Lehigh County EPB timely submitted all supplemental  
13 trading information requested by the Debtors on May 20, 2021, in compliance with the Order  
14 Approving Securities ADR and Related Procedures For Resolving Subordinated Securities  
15 Claims (the “ADR Procedures Order”).  
16

17 2. On October 13, 2023, Lehigh County EPB amended its claims to “adopt in whole  
18 the allegations set forth in the Third Amended Consolidated Class Action Complaint for the  
19 Violation of the Federal Securities Laws (ECF No. 121) filed in *In re PG&E Corp. Sec. Litig.*,  
20 No. #:18-cv-03509 (N.D.Cal.).  
21

22 3. Lehigh County EPB is among the hundreds, if not thousands, of securities  
23 claimants whose claims remain unresolved more than two years later. Notwithstanding timely  
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25 <sup>1</sup> The Court’s February 27, 2020 order denying Securities Lead Plaintiff’s Motion to Apply Bankruptcy Rule  
26 7023 to Class Proof of Claim and Extending Bar Date for Certain Holders of Securities Claims for Rescission or  
27 Damages (ECF No. 5943), provided for the mailing of the Rescission or Damage Claim Bar Date Notice by March  
10, 2023 (eight business days after the entry of the Order) (*id.*, at ¶ 5), and set midnight on April 16, 2020 as the  
Claim Bar Date (*id.*, at ¶ 2).

1 filing its claims in April 2020 and providing the Debtors with detailed supplemental trading  
2 information in 2021, the Debtors made an offer to resolve Lehigh County EPB's claims under  
3 the ADR Procedures Order only in May 2023.

4 4. In July 2023, Lehigh County EPB filed a joinder in all of the arguments set forth  
5 in the *Securities Lead Plaintiff's Memorandum of Points and Authorities In Support Of Motion*  
6 *For the Application Of Bankruptcy Rule 7023 And the Certification Of A Class Of Securities*  
7 *Claimants* (the "Rule 7023 Motion") [ECF no. 13865].

9 5. On December 13, 2023, Reorganized Debtors' filed their *Thirty-Third Securities*  
10 *Omnibus Claims Objection to PERA and Securities Act Plaintiffs' TAC, Including to Certain*  
11 *Claimants That Adopted the TAC* (the "Thirty-Third Objection") [ECF. No. 14200]. Lehigh  
12 EPB's claims were included in Exhibit A to the Thirty-Third Objection as "Claims to Be  
13 Disallowed and Expunged."

15 6. On January 30, 2024, this court appointed the Securities Lead Plaintiff (the New  
16 Mexico Public Employees' Retirement Association, or "PERA") as "lead plaintiff" on behalf of  
17 the Securities Claimants [ECF no. 14283], noting that the appointment will allow "the interests  
18 of a substantial group of claimants [to] be served more efficiently and effectively." [Id., at 3].

19 7. Lehigh EPB is one of the Securities Claimants who will "be served more  
20 efficiently and effectively" by PERA's appointment as the lead plaintiff. To that end, Lehigh  
21 EPB relies on PERA and its counsel to litigate the Reorganized Debtors' "motion to dismiss"  
22 the TAC, which is the basis for the Thirty-Third Objection [ECF no. 14200, p. 19].  
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1 **JOINDER**

2 8. For the foregoing reasons and the reasons set forth in the PERA's Opposition to  
3 the Thirty-Third Objection, Lehigh County EPB hereby joins in all of the arguments contained  
4 in PERA's Opposition to the Thirty-Third Objection in all respects, and adopts and incorporates  
5 them herein by reference.  
6

7 **CONCLUSION**

8 9. For the reasons set forth herein and in PERA's Opposition to the Thirty-Third  
9 Objection, Lehigh County EPB joins in PERA's Opposition and asks that overrule the Thirty-  
10 Third Objection in its entirety, and such other and further relief as may be just and proper.  
11

12 DATED: March 15, 2024

Respectfully submitted,

13 **BARRACK, RODOS & BACINE**

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